

TO: Clerk's Office

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK



APPLICATION FOR LEAVE  
TO FILE DOCUMENT UNDER SEAL

\*\*\*\*\*

IN RE AIR CARGO SERVICES  
ANTITRUST LITIGATION

MDL No. 1775

06-MD-1775  
Docket Number

\*\*\*\*\*

SUBMITTED BY: Plaintiff X Defendant \_\_\_\_\_ DOJ \_\_\_\_\_

Name: Robert N. Kaplan

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INDICATE UPON THE PUBLIC DOCKET SHEET: YES X NO

If yes, state description of document to be entered on docket sheet:

**FILED UNDER SEAL:**

Plaintiffs' un-redacted letter motion for an order directing Nippon Cargo Airlines Co., Ltd. ("NCA") to produce a prepared and educated Rule 30(b)(6) witness at its expense in the United States; and Exhibits 3-8 thereto.

**MANDATORY CERTIFICATION OF SERVICE:**

A.) X A copy of this application either has been or will be promptly served upon all parties to this action, B.) \_\_\_\_\_ Service is excused by 31 U.S.C. 3730(b), or by the following other statute or regulation: \_\_\_\_\_; or C.) \_\_\_\_\_ This is a criminal document submitted, and flight public safety, or security are significant concerns. (Check one)

08/25/2011  
DATE

/s/ Robert N. Kaplan  
SIGNATURE

**A) If pursuant to a prior Court Order:**

Docket Number of Case in Which Entered: 1:06-md-01775-JG-VVP

Docket Entry No. 599

Judge/Magistrate Judge: Viktor V. Pohorelsky

Date Entered: 09/21/2007

**B) If a new application,** the statute, regulation, or other legal basis that authorizes filing under seal

**ORDERED SEALED AND PLACED IN THE CLERK'S OFFICE,  
AND MAY NOT BE UNSEALED UNLESS ORDERED BY  
THE COURT.**

DATED: \_\_\_\_\_, NEW YORK

**U.S. DISTRICT JUDGE/U.S. MAGISTRATE JUDGE**

RECEIVED IN CLERK'S OFFICE \_\_\_\_\_  
DATE